

COMMONWEALTH OF MASSACHUSETTS

MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

Petition of Boston Gas Company d/b/a
KeySpan Energy Delivery New England

D.T.E. 03-40

**FOURTH SET OF INFORMATION REQUESTS OF THE
MASSACHUSETTS OILHEAT COUNCIL, INC. AND
THE MASSACHUSETTS ALLIANCE FOR FAIR COMPETITION, INC.**

- MOC-4-1: Please review and identify the annexed document consisting of testimony by the Hon. Alan Greenspan, Chairman of the Federal Reserve Board (marked as MOC Attachment to MOC-4-1).
- MOC-4-2: Please review and identify the annexed document consisting of testimony by Mr. Carl L. English, President and Chief Executive Officer of Consumers Energy (marked as MOC Attachment to MOC-4-2).
- MOC-4-3: Please identify and provide any documents prepared by or for the Company that discusses alternate marketing plans in the event of constrained natural gas supplies.
- MOC-4-4: Please identify and provide any documents prepared by or for the Company that discusses alternate marketing plans in the event of high natural gas prices.
- MOC-4-5: In the May 9th, 2002 Annual Shareholder Meeting Remarks of Robert B. Catell (provided by the Company in response to Information Request AG-1-9), Mr. Catell states:

“In 2001, we put 50,000 gas installations on the books. And more than a million and a half feet of new gas line in the ground in our key growth areas of Long Island, New England.”

With respect to this remark, please provide the following information:

- (a) please indicate how much of the new gas line placed in New England was within the Company's service territory; and
- (b) with regard to such new gas line placed in the Company's service territory, please indicate how much of that line was paid for by new customers, how much was paid for by the Company. Of the amount paid for by the Company, how much was recovered from ratepayers.

MOC-4-6: In the May 11, 2001 KeySpan Annual Meeting Remarks of Robert B. Catell (provided in response to AG-1-9), Mr. Catell states:

“Our primary target market on Long Island is the 118,000 homes that have a gas service but do not heat with gas, since converting these customers to gas heat does not require significant capital investment.”

Mr. Catell later explains that after acquiring Eastern Enterprises, KeySpan will utilize the same strategic marketing model of Long Island for the New England area.

With regard to the above-referenced comment please define and provide a dollar amount that the company considers to be a “significant capital investment”.

Dated: June 13, 2003